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November 10, 2017

VIA EMAIL ONLY

Carrie A. Claiborne
HUSCH BLACKWELL, LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
carrie.claiborne@huschblackwell.com

Re: ***Weisman v. Barnes Jewish Hospital, et al.***
Court No.: 19-cv-75-JAR

Dear Ms. Claiborne:

I would like to schedule a L.R. 3.04 conference to discuss your clients' answers to Plaintiff's discovery. I would like to have the conference within the next five (5) days if possible.

Your client's response to request to produce 3 is inadequate. First, no privilege log was produced. Second the reference you make to a nonexistent bates range is confusing. The response to requests 3 and 13 are improper in that we did not ask you to limit your search to the three named "custodians" you list. The response to request 9 is inadequate as your production does not appear to contain any responsive documents contrary to the statement in the response. The response to request 12 is inadequate as no privilege log has been provided.

Your client's objection to interrogatory 4, 13 and 17 are improper.

I look forward to speaking with you. Thank you very much for your anticipated cooperation.

Very truly yours,



Edward R. Moor

Carrie A. Claiborne

Weisman v. Barnes Jewish Hospital, et al.

July 14, 2021

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cc: Kevin Anthony Sullivan
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